

Honorable Barbara J. Rothstein

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

NORTHSHORE SHEET METAL, INC.,

Plaintiff,

v.

SHEET METAL WORKERS
INTERNATIONAL ASSOCIATION,
LOCAL 66,

Defendant.

Case No. 2:15-cv-01349 BJR

***DECLARATION OF
CHRISTOPHER L. HILGENFELD IN
SUPPORT OF PLAINTIFF'S MOTION TO
LIFT THE COURT'S MAY 23, 2016 STAY
OF PROCEEDINGS***

Noted on Motions Calendar: June 23, 2017

I, CHRISTOPHER L. HILGENFELD, declare as follows:

1. I am over the age of eighteen (18) years and I am competent to testify if called upon to do so.

2. I am an attorney with Davis Grimm Payne & Marra, counsel of record for Plaintiff Northshore Sheet Metal, Inc. ("Northshore" or "Plaintiff"), and I make this declaration based upon my personal knowledge.

1 3. Pursuant to Court's Order, dated September 4, 2015, the parties met with
2 Mediator Richard J. Omata on May 9, 2016 and again on October 18, 2016, to mediate the
3 Union's fringe benefits claim and Northshore's contractual damages claim. No resolution
4 was achieved between the parties during mediation.


5 4. The parties selected Douglas Hammond to serve as Arbitrator regarding the
6 Union's fringe benefits claim and Northshore's contractual damages claim. Arbitration was
7 conducted from January 30 through February 2, 2017.

8 5. On April 28, 2017, Arbitrator Hammond issued his decision and award in
9 favor of Northshore Sheet Metal, Inc. Attached hereto as Exhibit 1 is a true and correct
10 copy of the Opinion and Award by Douglas P. Hammond, issued April 28, 2017.

11 6. That on or about May 23, 2017, I conferred with the Union's attorney, Dan
12 Hutzenbiler. The Union did not object to the filing of the motion.

13 I declare under penalty of perjury under the laws of the State of Washington and the
14 United States that the foregoing statements are true and accurate.

15 Signed and dated at Seattle, Washington on this 2 day of June, 2017.

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20 Christopher L. Hilgenfeld
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